

MAZIE SLATER KATZ & FREEMAN, LLC

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Attorneys for Plaintiff

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

XAVIER INGRAM,

Plaintiff,

vs.

COUNTY OF CAMDEN,
CAMDEN COUNTY POLICE DEPARTMENT,
JEREMY MERCK,
ANTONIO GENNETTA,
NICHOLAS MARCHIAFAVA,
JOHN SCOTT THOMSON,
JOHN DOE(S) 1-50, and ABC ENTITIES 1-10,

Defendants.

CIVIL ACTION NO. 1:14-CV-05519

**NOTICE OF MOTION TO ENFORCE
SETTLEMENT**

TO: Clerk
United States District Court for the District of New Jersey
Mitchell H. Cohen Building & U.S. Courthouse
1 John F. Gerry Plaza, 4th & Cooper Streets
Camden, New Jersey 08101
(Via Electronic Filing)

Hon. Juan R. Sanchez, C.J.D.C.
United States District Court for the District of New Jersey
Mitchell H. Cohen Building & U.S. Courthouse
1 John F. Gerry Plaza, 4th & Cooper Streets
Camden, New Jersey 08101
(Via Electronic Filing and Lawyer's Service)

ALL COUNSEL OF RECORD
(Via Electronic Filing)

PLEASE TAKE NOTICE that the undersigned, as counsel on behalf of Plaintiff Xavier Ingram, shall move before the Honorable Juan R. Sanchez, U.S.C.J. on July 18, 2022 for an Order to Enforce Settlement reached on May 6, 2022, entering judgment against all defendants and their insurance carriers, together with attorney's fees and costs; and for such further relief as this Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that the undersigned shall rely on the attached brief, and Certification of counsel, Beth G. Baldinger with supporting exhibits; and proposed Order.

PLEASE TAKE FURTHER NOTICE that oral argument is requested.

Respectfully submitted,

MAZIE SLATER KATZ & FREEMAN, LLC
Attorneys for Plaintiff

BY: /s/ Beth G. Baldinger
BETH G. BALDINGER

Dated: June 23, 2022